

SUMMONS HEARING

UNITED STATES

Plaintiff,

-vs-

CATHERINE Y. PEI

Defendant.

Civil Action
No. 05-CV-141E
(USDC W.D. Pa.)

CERTIFIED TRANSCRIPT

DEPOSITION OF: CATHERINE Y. PEI

DATE: August 31, 2005
Wednesday, 10:00 a.m.

LOCATION: IRS Office
1314 Griswald Plaza
Erie, PA

TAKEN BY: Plaintiff
IRS

REPORTED BY: Cynthia A. Hawley
Notary Public
AKF Reference No. CH89912

1 DEPOSITION OF CATHERINE Y. PEI,
2 a witness, called by the Plaintiff, IRS, for
3 examination, in accordance with the Federal Rules of
4 Civil Procedure, taken by and before Cynthia A.
5 Hawley, a Court Reporter and Notary Public in and for
6 the Commonwealth of Pennsylvania, at the offices of
7 IRS 1314 Griswald Plaza, Erie, Pennsylvania, on
8 Wednesday, August 31, 2005, commencing at 9:52 a.m.

9 - - - -

10 APPEARANCES:

11 FOR THE PLAINTIFF, IRS:
12 Shannon L. Dickerson
13 DEPARTMENT OF THE TREASURY INTERNAL REVENUE SERVICE
14 11510 Georgia Ave., RM. 305
15 Wheaton, MD 20902
16 (202) 283-8064

17 FOR THE DEFENDANT, CATHERINE Y. PEI:
18 Thomas W. Patton, Esq.
19 PUBLIC DEFENDERS OFFICE
20 1001 State Street, Suite 1111
21 Erie, PA 16501
22 (814) 455-8089

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

* I N D E X *

Examination by Ms. Dickerson - - - - -	4
Certificate of Court Reporter - - - - -	25

* INDEX OF EXHIBITS *

(No Exhibits were marked.)

1 CATHERINE Y. PEI,
2 having been duly sworn,
3 was examined and testified as follows:

4 - - - -

5 EXAMINATION

6 - - - -

7 BY MS. DICKERSON:

8 Q. As you now, I'm Shannon Dickerson. I'm the
9 revenue agent who's been working this case for
10 an awful long time here. What we're here today
11 is to do a summons hearing based on the revised
12 order from the judge.

13 I'm going to ask you a number of
14 questions. Decide to answer them or not answer
15 them. The few first questions are just some
16 very general questions, you know. Again
17 whether you answer them or not that's up to
18 you. Starting off, what was your educational
19 background?

20 A. I have a B.A. in International Affairs from
21 George Washington University, Washington, D.C.

22 Q. What's your employment background?

23 A. Secretarial, administrative assistant.

24 Q. Where were you working during -- I know we're
25 talking about 1999 and 2000 as the tax years we

1 have under audit -- what were you doing, were
2 you working during those years or during your
3 marriage to Mr. Bynum, were you working?

4 A. Primarily a homemaker. I assisted with just
5 basic secretarial duties.

6 Q. For his company?

7 A. Correct.

8 Q. Were you compensated for that?

9 MR. PATTON: We'll not answer that on
10 the basis that her answers may incriminate her.

11 BY MS. DICKERSON:

12 Q. Where did you live during 1999 and 2000? I
13 know it's back.

14 A. Let's see, 2000 --

15 Q. The address on the returns is the --

16 A. 7517 Hawkins Creamery Road, Gaithersburg,
17 Maryland.

18 Q. How long did you reside there?

19 A. Approximately two years.

20 Q. During those two years?

21 A. I believe so. Part of the address -- prior to
22 that was 425 Red Birch Road, Millersville,
23 Maryland. I don't recall the zip code.

24 Q. So that was prior to '99 that you can
25 approximate?

1 A. I think.

2 MR. PATTON: To the best of your
3 memory.

4 THE WITNESS: Yes, to the best of my
5 memory those were the only two addresses.

6 BY MS. DICKERSON:

7 Q. And how long were you married?

8 A. Approximately six years, six and a half.
9 Excuse me, I'm sorry. We were together about
10 six and a half years. Married three years.

11 Q. When did you get married?

12 A. I have to think about this one. We were
13 divorced 2001, so three years prior.

14 Q. 1998. Do you recall approximately what your
15 monthly or annual income was in '99 and 2000?

16 MR. PATTON: She won't answer that.

17 BY MS. DICKERSON:

18 Q. Do you recall what your monthly expenses were?

19 MR. PATTON: She won't answer that.

20 BY MS. DICKERSON:

21 Q. Do you still wish to retain the services of
22 your power of attorney, Mr. Pressel, in
23 Maryland?

24 MR. PATTON: Could you explain that
25 to me, please?

1 MS. DICKERSON: When we first began
2 examination she did sign a power of attorney to
3 have someone represent her.

4 BY MS. DICKERSON:

5 Q. Oscar Pressel?

6 A. Oscar is my ex-spouse, Mark Bynum's,
7 accountant.

8 Q. Right.

9 A. And he sent me the request since I was out of
10 State, and since I didn't deal with the taxes I
11 didn't know anything about it.

12 MR. PATTON: And no, you don't want
13 to continue?

14 THE WITNESS: No, I do not.

15 MS. DICKERSON: Is there any way we
16 can get that in writing from you? Normally
17 when you do revoke the power of attorney,
18 because we do have a signed power of attorney
19 on file for her, actually what you could do is
20 fill out another one too.

21 I think we can just check the box or
22 even a short letter stating she wishes to
23 revoke the power of attorney for him. That
24 would be sufficient.

25 MR. PATTON: Could you give me his

1 name again, please?

2 MS. DICKERSON: Oscar Pressel and --
3 O-s-c-a-r H. P-r-e-s-s-e-l.

4 MR. PATTON: Do you know if he's
5 still at that same address?

6 MS. DICKERSON: Yes, he is.

7 BY MS. DICKERSON:

8 Q. So you haven't had any contact with him?

9 A. None whatsoever.

10 Q. Okay.

11 MS. DICKERSON: Do you wish to
12 discuss further the consent to extend the
13 Statute of Limitations, was that discussed any
14 further with her?

15 MR. PATTON: Yes, we discussed it,
16 and we are not going to extend the Statute of
17 Limitations.

18 MS. DICKERSON: Does she understand
19 her rights, the fact that if there was any
20 assessment made that if, for my reason, she
21 wishes to appeal that doesn't extend any time
22 period by not signing that? I mean, not only
23 does it protect our interest but it also
24 protects her interest also.

25 Basically what happens is if she

1 doesn't agree to sign it then we go further
2 with the examination based on the information
3 we have now and we have to issue a report based
4 on the facts and circumstances we have at this
5 point. Just so you understand that.

6 MR. PATTON: Yes, ma'am.

7 MS. DICKERSON: Once that notice is
8 issued, the Notice of Deficiency, it gives a
9 90-day period of time for you to respond. That
10 doesn't automatically extend a time period for
11 you to appeal.

12 MR. PATTON: Okay.

13 BY MS. DICKERSON:

14 Q. Do you recall who prepared your tax returns in
15 1999 and 2000?

16 A. Mark took care of everything, so I'm assuming
17 it's Oscar Pressel.

18 Q. Before signing the tax returns did you review
19 these returns, were they explained to you?

20 A. No, I did not. I was turned to the page of the
21 signature page, and I was directed where to
22 sign, and I signed it.

23 Q. Have you ever prepared your own tax returns?

24 A. Yes, I have, prior to the marriage and after
25 the marriage.

1 Q. Okay. What, if any, documents have you brought
2 today regarding the summons?

3 MR. PATTON: We won't answer that
4 question on the basis of self-incrimination.

5 BY MS. DICKERSON:

6 Q. Do you still hold a Leadenhall credit card in
7 your name?

8 MR. PATTON: She will not answer that
9 question.

10 BY MS. DICKERSON:

11 Q. Do you have it with you?

12 MR. PATTON: She will not answer that
13 question.

14 BY MS. DICKERSON:

15 Q. Was it destroyed or discarded?

16 MR. PATTON: She will not answer that
17 question.

18 BY MS. DICKERSON:

19 Q. How did you come to have a Mastercard credit
20 account with Leadenhall?

21 MR. PATTON: We will not answer that
22 question.

23 BY MS. DICKERSON:

24 Q. Did you set up that Mastercard personally?

25 MR. PATTON: Will not answer that

1 question.

2 BY MS. DICKERSON:

3 Q. Did you travel to the Bahamas to set that
4 account up?

5 MR. PATTON: We will not answer that
6 question.

7 BY MS. DICKERSON:

8 Q. What documents did you provide Leadenhall to
9 set the account up?

10 MR. PATTON: Will not answer that
11 question.

12 BY MS. DICKERSON:

13 Q. Were you required to provide a passport or any
14 form of identification?

15 MR. PATTON: Will not answer that
16 question.

17 BY MS. DICKERSON:

18 Q. Do you have a copy of the credit card
19 application?

20 MR. PATTON: Will not answer that
21 question.

22 BY MS. DICKERSON:

23 Q. Do you know whose name is on the credit card
24 application?

25 MR. PATTON: Will not answer that

1 question.

2 BY MS. DICKERSON:

3 Q. Did you use the Mastercard issued from
4 Leadenhall yourself during '99 or 2000?

5 MR. PATTON: Will not answer that
6 question.

7 BY MS. DICKERSON:

8 Q. How were the charges on that account paid at
9 this time?

10 MR. PATTON: Will not answer that
11 question.

12 BY MS. DICKERSON:

13 Q. Did you ever deal with anyone at Leadenhall?

14 MR. PATTON: Will not answer that
15 question.

16 BY MS. DICKERSON:

17 Q. Did anyone provide you with information about
18 the Mastercard issued by Leadenhall?

19 MR. PATTON: Will not answer that
20 question.

21 BY MS. DICKERSON:

22 Q. Did you question anyone about the card?

23 MR. PATTON: Will not answer that
24 question.

25

1 BY MS. DICKERSON:

2 Q. Do you have or did you have at any time copies
3 of any credit card statements?

4 MR. PATTON: Will not answer that
5 question.

6 BY MS. DICKERSON:

7 Q. Have you taken any steps to reconstruct these
8 records?

9 MR. PATTON: Will not answer that
10 question.

11 BY MS. DICKERSON:

12 Q. Who else had access to these accounts and
13 statements?

14 MR. PATTON: Will not answer that
15 question.

16 BY MS. DICKERSON:

17 Q. Where were the credit cards mailed?

18 MR. PATTON: Will not answer that
19 question.

20 BY MS. DICKERSON:

21 Q. Where were they addressed to?

22 MR. PATTON: Will not answer that
23 question.

24 BY MS. DICKERSON:

25 Q. Did you review these credit card statements?

1 MR. PATTON: Will not answer that
2 question.

3 BY MS. DICKERSON:

4 Q. Were there any disputed charges or credits on
5 these statements, and if so, did you resolve
6 any of these issues?

7 MR. PATTON: Will not answer that
8 question.

9 BY MS. DICKERSON:

10 Q. If the statements were not mailed how were
11 transactions and payments reconciled?

12 MR. PATTON: Will not answer that
13 question.

14 BY MS. DICKERSON:

15 Q. What arrangement, if any, did you have to use
16 the Mastercard issued by Leadenhall?

17 MR. PATTON: Will not answer that
18 question.

19 BY MS. DICKERSON:

20 Q. How did you know how much you could spend?

21 MR. PATTON: Will not answer that
22 question.

23 BY MS. DICKERSON:

24 Q. What was the limit on the credit card?

25 MR. PATTON: Will not that question.

1 BY MS. DICKERSON:

2 Q. Were you ever declined for insufficient credit
3 on the use of the card?

4 MR. PATTON: Will not answer that
5 question.

6 BY MS. DICKERSON:

7 Q. Were there ever any refunds or checks issued on
8 this account?

9 MR. PATTON: Will not answer that
10 question.

11 BY MS. DICKERSON:

12 Q. Did you have any communications with Leadenhall
13 regarding this credit card or bank account
14 attached to the credit card?

15 MR. PATTON: Will not answer that
16 question.

17 BY MS. DICKERSON:

18 Q. How much money was deposited to the bank
19 account that secured the card?

20 MR. PATTON: Will not answer that
21 question.

22 BY MS. DICKERSON:

23 Q. What was the source of these funds?

24 MR. PATTON: Will not answer that
25 question.

1 BY MS. DICKERSON:

2 Q. Who made the payments on this credit card
3 account?

4 MR. PATTON: Will not answer that
5 question.

6 BY MS. DICKERSON:

7 Q. What was the source for the payment of these
8 funds?

9 MR. PATTON: Will not answer that
10 question.

11 BY MS. DICKERSON:

12 Q. What actions have you done to obtain copies of
13 this information?

14 MR. PATTON: Will not answer that
15 question.

16 BY MS. DICKERSON:

17 Q. What was the agreement with Leadenhall for
18 getting access to copies?

19 MR. PATTON: Will not answer that
20 question.

21 BY MS. DICKERSON:

22 Q. Who at Leadenhall did you call if there was a
23 problem?

24 MR. PATTON: Will not answer that
25 question?

1 BY MS. DICKERSON:

2 Q. How much money did you put in the security
3 account to open the credit card account?

4 MR. PATTON: Will not answer that
5 question.

6 BY MS. DICKERSON:

7 Q. Who paid it, if there was any?

8 MR. PATTON: Will not answer that
9 question.

10 BY MS. DICKERSON:

11 Q. Where did the funds come from?

12 MR. PATTON: Will not answer that
13 question.

14 BY MS. DICKERSON:

15 Q. Where was the bank account maintained that was
16 attached to the foreign credit card?

17 MR. PATTON: Will not answer that
18 question.

19 BY MS. DICKERSON:

20 Q. What is the account number?

21 MR. PATTON: Will not answer that
22 question.

23 BY MS. DICKERSON:

24 Q. Who are the account holders?

25 MR. PATTON: Will not answer that

1 question.

2 BY MS. DICKERSON:

3 Q. Were any of these accounts interest bearing?

4 MR. PATTON: Will not answer that
5 question.

6 BY MS. DICKERSON:

7 Q. How are earnings, interest, dividends, profits
8 accounted for and are reported on your tax
9 return?

10 MR. PATTON: Can I have a second?
11 Can you repeat that, please?

12 BY MS. DICKERSON:

13 Q. How are the earnings, whether interest,
14 dividends or profits accounted for and are
15 reported on the tax returns?

16 MR. PATTON: We will not answer that
17 question. --

18 BY MS. DICKERSON:

19 Q. Do you have copies of any of these bank
20 statements?

21 MR. PATTON: We will not answer that
22 question.

23 BY MS. DICKERSON:

24 Q. What efforts have you made to obtain any of
25 this information?

1 MR. PATTON: Will not answer that
2 question.

3 BY MS. DICKERSON:

4 Q. When was the account opened, and when was it
5 closed?

6 MR. PATTON: Will not answer those
7 questions.

8 BY MS. DICKERSON:

9 Q. Were any changes made to the account since
10 inception?

11 MR. PATTON: Will not answer that
12 question.

13 BY MS. DICKERSON:

14 Q. What transfers were made to or from this bank
15 account?

16 MR. PATTON: Will not answer that
17 question.

18 BY MS. DICKERSON:

19 Q. Are you aware of any filing requirements for
20 having an interest in a foreign bank account?

21 MR. PATTON: Will not answer that
22 questions.

23 BY MS. DICKERSON:

24 Q. Did any of the foreign accounts have an
25 aggregate balance of \$10,000 or more in 1999 or

1 2000?

2 MR. PATTON: Will not answer that
3 question.

4 BY MS. DICKERSON:

5 Q. Have you ever filed with a Treasury Department
6 a document entitled Report of Foreign Bank and
7 Financial Accounts? It's a specific form, TD
8 F90-22.1?

9 MR. PATTON: Will not answer that
10 question.

11 BY MS. DICKERSON:

12 Q. Did you receive any income from a nondomestic
13 source during '99 or 2000?

14 MR. PATTON: Will not answer that
15 question.

16 BY MS. DICKERSON:

17 Q. Were there any other domestic sources of income
18 that have not yet been identified during this
19 examination in '99 or 2000?

20 MR. PATTON: Will not answer that
21 question.

22 BY MS. DICKERSON:

23 Q. What, if any, was your involvement with Cash 4
24 Titles?

25 MR. PATTON: Hang on one second on

1 that.

2 THE WITNESS: None whatsoever.

3 BY MS. DICKERSON:

4 Q. Was your ex-husband ever involved in any other
5 similar activities to Cash 4 Titles that you
6 are aware of?

7 A. I don't know, don't know.

8 Q. Okay. When and how did you first hear about
9 Cash 4 Titles?

10 MR. PATTON: We will not answer that
11 question.

12 BY MS. DICKERSON:

13 Q. Was there any individual person connected to
14 this investment that you are aware of?

15 A. (Witness shaking head.)

16 Q. Okay. Did you ever receive any monies or
17 proceeds from this investment?

18 A. (Witness shaking head.)

19 MR. PATTON: We will not answer that
20 question.

21 BY MS. DICKERSON:

22 Q. Are you aware of who your ex-husband's clients
23 were?

24 MR. PATTON: Will not answer that
25 question.

1 BY MS. DICKERSON:

2 Q. Where did your ex-husband work during 1999 and
3 2000?

4 A. He was self-employed.

5 Q. Name of the company?

6 A. It was either Bynum Insurance and Investment
7 Group or Maryland Retirement Services. I don't
8 know if they both existed at the same time or
9 if one superseded another.

10 Q. Do you maintain a passport?

11 A. Yes.

12 Q. Do you happen to have a copy of it, or is there
13 any way we can inspect that? That was one of
14 the summons items.

15 MR. PATTON: No, we will not answer
16 that and will not produce it for inspection.

17 BY MS. DICKERSON:

18 Q. Did you travel out of the country any time
19 during '99 or 2000?

20 MR. PATTON: Will not answer that
21 question.

22 BY MS. DICKERSON:

23 Q. If so, where, when and what was the purpose?

24 MR. PATTON: Will not answer that
25 question.

1 BY MS. DICKERSON:

2 Q. If so, did you visit any banks, financial
3 advisors or other investment related
4 establishments while traveling?

5 MR. PATTON: Will not answer
6 question.

7 BY MS. DICKERSON:

8 Q. Were you involved in any private banking?

9 MR. PATTON: Will not answer that
10 question.

11 BY MS. DICKERSON:

12 Q. Do you have any questions about the examination
13 at this point in time?

14 MR. PATTON: I don't.

15 THE WITNESS: No.

16 MR. PATTON: No.

17 MS. DICKERSON: Well, that does
18 conclude the questions I needed to ask you. I
19 assume from here what's going to happen is it's
20 going to have to be taken back to the judge.

21 MR. PATTON: That's my understanding.

22 MS. DICKERSON: So from there, I
23 don't know what legal process takes, you know,
24 takes precedence at that point. That's, I
25 guess, out of my hands at this time.

1 MR. PATTON: Okay.

2 MS. DICKERSON: Okay. So I guess one
3 way or another we'll be in contact, my guess is
4 through the Department of Justice will probably
5 be the person to be in contact with you.

6 MR. PATTON: Yes.

7 MS. DICKERSON: Do you have any
8 questions?

9 MR. PATTON: No, ma'am.

10 MS. DICKERSON: You have my number if
11 you need to contact me?

12 MR. PATTON: Yes.

13 - - - -

14 (Whereupon, the proceedings were
15 concluded at 10:09 a.m.)

16 - - - -

17

18

19

20

21

22

23

24

25

R E P O R T E R ' S C E R T I F I C A T E

I hereby certify that the transcript of the proceedings and evidence contained herein are a true and accurate transcription of my stenographic notes taken by me at the time and place of the within cause; that the transcription was reduced to printing under my direction; and that this is a true and correct transcript of the same.

September 19, 2005

Cynthia A. Hawley
AKF REPORTERS, INC.

Cynthia A. Hawley

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Pittsburgh, PA Cynthia A. Hawley, Notary Public
412-261-2323 City of Erie, PA
My Commission Expires June 30, 2009

Member Pennsylvania Association of Notaries

Erie, PA
814-453-5700

AKF

CH89912.TXT

Page 1

-----	9:15;	16:18	annual 6:15
'	12:4;	accordance	another
-----	20:1,13,	2:2	7:20;
' 25:4	19; 22:3,	account	22:9; 24:3
'99 5:24;	19	10:20;	answer
6:15;	2001 6:13	11:4,9;	4:14,17;
12:4;	2005	12:8;	5:9; 6:16,
20:13,19;	1:14.5;	15:8,13,	19; 10:3,
22:19	2:4.5;	19; 16:3;	8,12,16,
-----	25:16	17:3,15,	21,25;
*	202 2:11	20,24;	11:5,10,
-----	20902	19:4,9,15,	15,20,25;
* 3:1,8	2:10.5	20	12:5,10,
-----	25 3:3	accountant	14,19,23;
-	283-8064	7:7	13:4,9,14,
-----	2:11	accounted	18,22;
- 1:2,11,	-----	18:8,14	14:1,7,12,
13; 2:6;	3	accounts	17,21;
4:4,6;	-----	13:12;	15:4,9,15,
24:13,16	305 2:10	18:3;	20,24;
-vs- 1:6	31 1:14.5;	19:24;	16:4,9,14,
-----	2:4.5	20:7	19,24;
0	-----	accurate	17:4,8,12,
-----	4	25:9	17,21,25;
05-CV-141E	-----	Action 1:6	18:4,16,
1:6.5	4 3:2;	actions	21; 19:1,
-----	20:23;	16:12	6,11,16,
1	21:5,9	activities	21; 20:2,
-----	425 5:22	21:5	9,14,20;
10,000	455-8089	actually	21:10,19,
19:25	2:15.5	7:19	24; 22:15,
1001 2:14.5	-----	address	20,24;
10:00 1:15	7	5:15,21;	23:5,9
10:09 24:15	-----	8:5	answers
1111 2:14.5	7517 5:16	addressed	5:10
11510 2:10	-----	13:21	appeal
1314 1:17;	8	addresses	8:21; 9:11
2:4	-----	6:5	APPEARANCES
16501 2:15	814 2:15.5	administra-	2:7.5
19 25:16	-----	tive 4:23	application
1998 6:14	9	advisors	11:19,24
1999 4:25;	-----	23:3	approximate
5:12;	90-day 9:9	Affairs	5:25
9:15;	9:52 2:4.5	4:20	approximat-
19:25;	-----	agent 4:9	ely 5:19;
22:2	A	aggregate	6:8,14
-----	-----	19:25	arrangement
2	a.m 1:15;	agree 9:1	14:15
-----	2:4.5;	agreement	assessment

CH89912.TXT

Page 2

assisted	best 6:2,4	closed 19:5	1:20.5;
5:4	Birch 5:22	code 5:23	2:2.5;
assume	both 22:8	come 10:19;	25:16.5
23:19	box 7:21	17:11	-----
assuming	brought	commencing	D
9:16	10:1	2:4.5	-----
attached	Bynum 5:3;	Commonweal-	D.C 4:21
15:14;	22:6	th 2:3.5	DATE 1:14.5
17:16	Bynum's 7:6	communicat-	deal 7:10;
audit 5:1	-----	ions 15:12	12:13
August	C	company	Decide 4:14
1:14.5;	-----	5:6; 22:5	declined
2:4.5	call 16:22	compensated	15:2
automatica-	called	5:8	Defendant
lly 9:10	2:1.5	conclude	1:9; 2:13
Ave. 2:10	card 10:6;	23:18	DEFENDERS
aware	11:18,23;	concluded	2:14
19:19;	12:22;	24:15	Deficiency
21:6,14,22	13:3,25;	connected	9:8
awful 4:10	14:24;	21:13	DEPARTMENT
-----	15:3,13,	consent	2:9.5;
B	14,19;	8:12	20:5; 24:4
-----	16:2;	contact	deposited
B.A. 4:20	17:3,16	8:8; 24:3,	15:18
back 5:13;	cards. 13:17	5,11	DEPOSITION
23:20	care 9:16	contained	1:12; 2:1
background	case 4:9	25:8	destroyed
4:19,22	Cash 20:23;	continue	10:15
Bahamas	21:5,9	7:13	Dickerson
11:3	CATHERINE	copies	2:9; 3:2;
balance	1:7,12;	13:2;	4:7,8;
19:25	2:1,13;	16:12,18;	5:11; 6:6,
bank 15:13,	4:1	18:19	17,20;
18; 17:15;	cause 25:11	copy 11:18;	7:1,4,15;
18:19;	Certificate	22:12	8:2,6,7,
19:14,20;	3:3	correct	11,18;
20:6	certify	5:7; 25:13	9:7,13;
banking	25:7	country	10:5,10,
23:8	CH89912	22:18	14,18,23;
banks 23:2	1:21.5	Creamery	11:2,7,12,
based 4:11;	changes	5:16	17,22;
9:2,3	19:9	credit	12:2,7,12,
basic 5:5	charges	10:6,19;	16,21;
Basically	12:8; 14:4	11:18,23;	13:1,6,11,
8:25	check 7:21	13:3,17,	16,20,24;
basis 5:10;	checks 15:7	25; 14:24;	14:3,9,14,
10:4	circumstan-	15:2,13,	19,23;
bearing	ces 9:4	14; 16:2;	15:1,6,11,
18:3	Civil 1:6;	17:3,16	17,22;

CH89912.TXT

Page 3

14,19,23;	efforts	facts 9:4	happen
18:2,6,12,	18:24	Federal 2:2	22:12;
18,23;	either 22:6	few 4:15	23:19
19:3,8,13,	employment	file 7:19	happens
18,23;	4:22	filed 20:5	8:25
20:4,11,	entitled	filing	Hawkins
16,22;	20:6	19:19	5:16
21:3,12,	Erie	fill 7:20	Hawley
21; 22:1,	1:17.5;	financial	1:20.5;
17,22;	2:4,15	20:7; 23:2	2:3;
23:1,7,11,	Esq 2:13.5	first 4:15;	25:16.5
17,22;	establishm-	7:1; 21:8	head 21:15,
24:2,7,10	ents 23:4	follows 4:3	18
directed	even 7:22	foreign	hear 21:8
9:21	everything	17:16;	hearing
direction	9:16	19:20,24;	1:1; 4:11
25:12	evidence	20:6	hereby 25:7
discarded	25:8	form 11:14;	herein 25:8
10:15	ex-husband	20:7	hold 10:6
discuss	21:4; 22:2	funds	holders
8:12	ex-husband-	15:23;	17:24
discussed	's 21:22	16:8;	homemaker
8:13,15	ex-spouse	17:11	5:4
disputed	7:6	further	-----
14:4	examination	8:12,14;	I
dividends	2:2; 3:2;	9:1	-----
18:7,14	4:5; 7:2;	-----	identifica-
divorced	9:2;	G	tion 11:14
6:13	20:19;	-----	identified
document	23:12	Gaithersbu-	20:18 --
20:6	examined	rg 5:16	INC 25:17
documents	4:3	general	inception
10:1; 11:8	Excuse 6:9	4:16	19:10
doing 5:1	EXHIBITS	George 4:21	income
domestic	3:8,9.5	Georgia	6:15;
20:17	existed	2:10	20:12,17
done 16:12	22:8	getting	incriminate
duly 4:2	expenses	16:18	5:10
during	6:18	give 7:25	INDEX 3:8
4:24; 5:2,	explain	gives 9:8	individual
12,20;	6:24	Griswald	21:13
12:4;	explained	1:17; 2:4	information
20:13,18;	9:19	Group 22:7	9:2;
22:2,19	extend	guess	12:17;
duties 5:5	8:12,16,	23:25;	16:13;
-----	21; 9:10	24:2,3	18:25
E	-----	-----	inspect
-----	F	H	22:13
earnings	-----	-----	inspection

CH89912.TXT

Page 4

Insurance	1:16.5	8:2,6,7,	Notary
22:6	long 4:10;	11,18;	1:21; 2:3
interest	5:18; 6:7	9:7,13;	notes 25:9
8:23,24;	-----	10:5,10,	notice 9:7,
18:3,7,13;	M	14,18,23;	8
19:20	-----	11:2,7,12,	number
INTERNAL	ma'am 9:6;	17,22;	4:13;
2:9.5	24:9	12:2,7,12,	17:20;
Internatio-	made 8:20;	16,21;	24:10
nal 4:20	16:2;	13:1,6,11,	-----
investment	18:24;	16,20,24;	O
21:14,17;	19:9,14	14:3,9,14,	-----
22:6; 23:3	mailed	19,23;	O-s-c-a-r
involved	13:17;	15:1,6,11,	8:3
21:4; 23:8	14:10	17,22;	obtain
involvement	maintain	16:1,6,11,	16:12;
20:23	22:10	16,21;	18:24
IRS 1:16.5,	maintained	17:1,6,10,	Office
19.5;	17:15	14,19,23;	1:16.5;
2:1.5,4,	Mark 7:6;	18:2,6,12,	2:14
8.5	9:16	18,23;	offices
issue 9:3	marked	19:3,8,13,	2:3.5
issued 9:8;	3:9.5	18,23;	Okay 8:10;
12:3,18;	marriage	20:4,11,	9:12;
14:16;	5:3; 9:24,	16,22;	10:1;
15:7	25	21:3,12,	21:8,16;
issues 14:6	married	21; 22:1,	24:1,2
items 22:14	6:7,10,11	17,22;	Once 9:7
-----	Maryland	23:1,7,11,	one 6:12;
J	5:17,23;	17,22;	7:20; -
-----	6:23; 22:7	24:2,7,10	20:25;
judge 4:12;	Mastercard	much 14:20;	22:9,13;
23:20	10:19,24;	15:18;	24:2
Justice	12:3,18;	17:2	only 6:5;
24:4	14:16	-----	8:22
-----	MD 2:10.5	N	open 17:3
L	mean 8:22	-----	opened 19:4
-----	memory 6:3,	name 8:1;	order 4:12
Leadenhall	5	10:7;	Oscar 7:5,
10:6,20;	Millersvil-	11:23;	6; 8:2;
11:8;	le 5:22	22:5	9:17
12:4,13,	money	need 24:11	other
18; 14:16;	15:18;	needed	20:17;
15:12;	17:2	23:18	21:4; 23:3
16:17,22	monies	No. 1:6.5,	out 7:9,20;
legal 23:23	21:16	21.5	22:18;
letter 7:22	monthly	nondomestic	23:25
limit 14:24	6:15,18	20:12	own 9:23
Limitations	Ms. 3:2;	None 8:9;	-----

CH89912.TXT

Page 5

e-1 8:3	PEI 1:7,12;	proceeds	4:14,15,
Pa 1:7,	2:1,13;	21:17	16; 19:7,
17.5; 2:15	4:1	process	22; 23:12,
page 9:20,	Pennsylvan-	23:23	18; 24:8
21	ia 2:3.5,4	produce	-----
paid 12:8;	period	22:16	R
17:7	8:22; 9:9,	profits	-----
Part 5:21	10	18:7,14	reason 8:20
passport	person	protect	recall
11:13;	21:13;	8:23	5:23;
22:10	24:5	protects	6:14,18;
Patton	personally	8:24	9:14
2:13.5;	10:24	provide	receive
5:9; 6:2,	place 25:10	11:8,13;	20:12;
16,19,24;	Plaintiff	12:17	21:16
7:12,25;	1:5,19;	Public	reconciled
8:4,15;	2:1.5,8.5	1:21; 2:3,	14:11
9:6,12;	Plaza 1:17;	14	reconstruct
10:3,8,12,	2:4	purpose	13:7
16,21,25;	please	22:23	records
11:5,10,	6:25; 8:1;	put 17:2	13:8
15,20,25;	18:11	-----	Red 5:22
12:5,10,	point 9:5;	Q	reduced
14,19,23;	23:13,24	-----	25:11
13:4,9,14,	power 6:22;	question	Reference
18,22;	7:2,17,18,	10:4,9,13,	1:21.5
14:1,7,12,	23	17,22;	refunds
17,21,25;	prepared	11:1,6,11,	15:7
15:4,9,15,	9:14,23	16,21;	regarding
20,24;	presidence	12:1,6,11,	10:2; -
16:4,9,14,	23:24	15,20,22,	15:13
19,24;	Pressel	24; 13:5,	related
17:4,8,12,	6:22; 7:5;	10,15,19,	23:3
17,21,25;	8:2; 9:17	23; 14:2,	repeat
18:4,10,	Primarily	8,13,18,	18:11
16,21;	5:4	22,25;	report 9:3;
19:1,6,11,	printing	15:5,10,	20:6
16,21;	25:11	16,21,25;	reported
20:2,9,14,	prior 5:21,	16:5,10,	1:20.5;
20,25;	24; 6:13;	15,20,25;	18:8,15
21:10,19,	9:24	17:5,9,13,	Reporter
24; 22:15,	private	18,22;	2:3; 3:3
20,24;	23:8	18:1,5,17,	REPORTERS
23:5,9,14,	probably	22; 19:2,	25:17
16,21;	24:4	12,17;	represent
24:1,6,9,	problem	20:3,10,	7:3
12	16:23	15,21;	request 7:9
payment	Procedure	21:11,20,	required
16:7	2:2.5	25; 22:21,	11:13

CH89912.TXT

Page 6

resolve	services	Street	travel
14:5	6:21; 22:7	2:14.5	11:3;
respond 9:9	set 10:24;	sufficient	22:18
retain 6:21	11:3,9	7:24	traveling
Retirement	shaking	Suite	23:4
22:7	21:15,18	2:14.5	TREASURY
return 18:9	Shannon	summons	2:9.5;
returns	2:9; 4:8	1:1; 4:11;	20:5
5:15;	short 7:22	10:2;	true 25:8,
9:14,18,	sign 7:2;	22:14	12
19,23;	9:1,22	superseded	turned 9:20
18:15	signature	22:9	two 5:19,
revenue	9:21	sworn 4:2	20; 6:5
2:9.5; 4:9	signed	-----	-----
review	7:18; 9:22	T	U
9:18;	signing	-----	-----
13:25	8:22; 9:18	tax 4:25;	under 5:1;
revised	similar	9:14,18,	25:12
4:11	21:5	23; 18:8,	understand
revoke	since 7:9,	15	8:18; 9:5
7:17,23	10; 19:9	taxes 7:10	understand-
rights 8:19	six 6:8,10	TD 20:7	ing 23:21
RM. 2:10	someone 7:3	testified	UNITED 1:3
Road 5:16,	sorry 6:9	4:3	University
22	source	Thomas	4:21
Rules 2:2	15:23;	2:13.5	up 4:17;
-----	16:7;	three 6:10,	10:24;
S	20:13	13	11:4,9
-----	sources	time 4:10;	USDC 1:7
same 8:5;	20:17	8:21; 9:9,	-----
22:8;	specific	10; 12:9;	V
25:13	20:7	13:2;	-----
second	spend 14:20	22:8,18;	visit 23:2
18:10;	Starting	23:13,25;	-----
20:25	4:18	25:10	W
secretarial	State	Titles	-----
4:23; 5:5	2:14.5;	20:24;	W.D. 1:7
secured	7:10	21:5,9	Washington
15:19	statements	today 4:10;	4:21
security	13:3,13,	10:2	way 7:15;
17:2	25; 14:5,	together	22:13;
see 5:14	10; 18:20	6:9	24:3
self-emplo-	STATES 1:3	took 9:16	Wednesday
yed 22:4	stating	transactio-	1:15;
self-incrimination	7:22	ns 14:11	2:4.5
10:4	Statute	transcript	whatsoever
sent 7:9	8:13,16	25:7,13	8:9; 21:2
September	stenograph-	transcript-	Wheaton
	ic 25:9	ion 25:9,	2:10.5

CH89912.TXT

Page 7

4:17;	6:8,10,13
18:13	yourself
who's 4:9	12:4
will 10:8,	-----
12,16,21,	z
25; 11:5,	-----
10,15,20,	zip 5:23
25; 12:5,	-----
10,14,19,	-----
23; 13:4,	-----
9,14,18,	-----
22; 14:1,	-----
7,12,17,	-----
21,25;	25:16
15:4,9,15,	
20,24;	
16:4,9,14,	
19,24;	
17:4,8,12,	
17,21,25;	
18:4,16,	
21; 19:1,	
6,11,16,	
21; 20:2,	
9,14,20;	
21:10,19,	
24; 22:15,	
16,20,24;	
23:5,9;	
24:4	
wish 6:21;	
8:11	
wishes	
7:22; 8:21	
within	
25:10	
witness	
2:1.5;	
6:4; 7:14;	
21:2,15,	
18; 23:15	
work 22:2	
working	
4:9,24;	
5:2,3	
writing	
7:16	

Y	